

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Bair Hugger Forced Air Warming
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to:
ALL CASES

**DECLARATION OF BENJAMIN
W. HULSE IN SUPPORT OF
DEFENDANTS' RULE 37
MOTION TO BAR PLAINTIFFS'
NEW GENERAL CAUSATION
EXPERT OPINIONS**

Benjamin W. Hulse, being first duly sworn, deposes, and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys who represents 3M Company and Arizant Healthcare Inc. (together, "Defendants") in this litigation. I submit this declaration in support of Defendants' Rule 37 Motion to Bar Plaintiffs' New General Causation Expert Opinions. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Exhibit A is a true and correct copy of excerpts from the transcript of the September 8, 2016 MDL status conference hearing.
2. Attached as Exhibit B is a true and correct copy of excerpts from the transcript of the June 15, 2017 MDL status conference hearing.
3. Attached as Exhibit C is a true and correct copy of a letter dated June 6, 2017 from plaintiffs' counsel, Michael Ciresi.
4. Attached as Exhibit D is a true and correct copy of excerpts from the deposition of Yadin David, dated August 1, 2017.

5. Attached as Exhibit E is a true and correct copy of excerpts from the deposition of John Abraham, dated July 20, 2017.

6. Attached as Exhibit F is a true and correct copy of the expert report of Said Elghobashi, dated March 29, 2017.

7. Attached as Exhibit G is a true and correct copy of Yadin David's Supplemental Report, served August 10, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, Minnesota, this 23rd day of August, 2018.

s/Benjamin W. Hulse
Benjamin W. Hulse